Iowa Department of Natural Resources Title V Operating Permit

Name of Permitted Facility: University of Iowa

(Main Power Plant)

Facility Location: 207 W. Burlington Street

Iowa City, Iowa 52242

Air Quality Operating Permit Number: 00-TV-001R1-M001

Expiration Date: 10/25/2010

EIQ Number: 92-5191

Facility File Number: 52-01-005

Responsible Official

Name: Douglas K. True

Title: Vice President for Finance and Operations and University

Treasurer

Mailing Address: 105 Jessup Hall

Iowa City, Iowa 52242-1316

Phone #: (319) 335-3552

Permit Contact Person for the Facility

Name: Mark Maxwell

Title: Environmental Engineer
Mailing Address: 207 West Burlington Street

Iowa City, Iowa 52242-1520

Phone #: (319) 335-6185

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit. Two Title V Permits are being issued for the University of Iowa (one stationary source). This permit is for the Main Power Plant portion of the University as well as some of the Oakdale sources and permit 00-TV-002R1 is for the Main Campus and Hospital and the remaining Oakdale sources.

For the Director of the Department of Natural Resources

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Abbreviations

acfm	.actual cubic feet per minute
CFR	.Code of Federal Regulation
CE	.control equipment
	.continuous emission monitor
°F	.degrees Fahrenheit
	.emissions inventory questionnaire
EP	.emission point
EU	emission unit
gr./dscf	grains per dry standard cubic foot
gr./100 cf	grains per one hundred cubic feet
IAC	.Iowa Administrative Code
IDNR	.Iowa Department of Natural Resources
kW	.Kilowatts
MVAC	.motor vehicle air conditioner
NAICS	.North American Industry Classification System
NSPS	.new source performance standard
ppmv	.parts per million by volume
lb./hr	
lb./MMBtu	pounds per million British thermal units
PSD	prevention of significant deterioration
SCC	.Source Classification Codes
scfm	standard cubic feet per minute
	.Standard Industrial Classification
TPY	.tons per year
USEPA	.United States Environmental Protection Agency
Pollutants	
PM	.particulate matter
PM_{10}	particulate matter ten microns or less in diameter
SO ₂	sulfur dioxide
NO _x	.nitrogen oxides
	volatile organic compound
CO	
HAP	.hazardous air pollutant

I. Facility Description and Equipment List

Facility Name: University of Iowa (Main Power Plant)

Permit Number: 00-TV-001R1-M001

Facility Description: University (SIC 8221)

Equipment List

Emission	Emission	Emission Unit Description	IDNR Construction
Point	Unit		Permit Number
Number	Number		
	OD#1	Oakdale Boiler #1	
EP-239-1	OD#2	Oakdale Boiler #2	78-A-023-S4
237 1	OD#3	Oakdale Boiler #3	701102351
	OD#4	Oakdale Boiler #4	
3	3	Boiler No.7	91-A-064 & PSD ¹
4	4	Boiler No.8	91-A-063 & PSD
6	6	Boiler No.10	75-A-282-S1 & PSD
7	7	Boiler No.11	95-A-438-S1 & PSD
PP43	PP43	Temporary Boiler 1	06-A-778
PP44	PP44	Temporary Boiler 2	06-A-779
8	8	Coal Crusher No.1	PSD
9	9	Coal Crusher No.2	PSD
10	10	Coal Silo No.1	N/A
11	11	Coal Silo No.2	N/A
12	12	Coal Silo No.3	PSD
13	13	Limestone Silo	94-A-199 & PSD
14a1	14a	Ash Silo	PSD
14a2	14a	Ash Silo	
14b	14b	Ash Conveying	96-A-1125
17	17	North Coal Bunker	PSD
18	18	South Coal Bunker	PSD
EP-239-3	EU-239-3-1	Oakdale PP Emergency Generator	04-A-428-S1
27	27	Emergency Diesel Generator (2347 BHP)	97-A-1035
28	28	Coal Unloading Pit	N/A
30	30	Minibunker 11	95-A-439
30	31	Coal Crusher No.3	95-A-439
30	32	Coal Crusher No.4	95-A-439
40	40	Biomass Silo Dust Collector	03-A-1149-S1
41	41a	Biomass Unloading	03-A-1150-S1
41a Fug	41a	Biomass Unloading	03-A-1150-S1
41	41b	Biomass Conveying	03-A-1150-S1
42	42	Biomass Silo Skirt	03-A-1151

²EPA issued PSD Permit dated June 9, 1987, amended on January 19, 1988.

Insignificant Activities Equipment List

Insignificant	Insignificant Emission Unit Description	
Emission Unit		
Number		
33	Parts Washer	
34	Maintenance Welding	
35	Shot Blast	
36F-1	Antifreeze Tank No.1 (2,200 gallons)	
36F-2	Antifreeze Tank No.2 (2,500 gallons)	
38F	Ash Loadout	
39	Diesel Generator #7 Fuel Oil Tank #1 (1,200 gallons)	
39a	Diesel Generator #7 Fuel Oil Tank #2 (550 gallons)	
43	Parts Washer	
44	Parts Washer	

II. Plant-Wide Conditions (Main Power Plant And Included Oakdale Facility Units Only)

Facility Name: University of Iowa (Main Power Plant)

Permit Number: 00-TV-001R1-M001

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: five years.

Commencing on: 10/26/2005

Ending on: 10/25/2010

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Emission Limits (Main Power Plant And Included Oakdale Units Only)

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

<u>Coal and Limestone Storage:</u> Coal and limestone shall be stored in enclosed facilities. Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

<u>Surfaces Used by Truck Traffic:</u> The Owner/Operator shall not cause visible particulate matter emissions due to truck traffic beyond the boundary line proposed by the University in its letter to EPA, dated January 20, 1987. Compaction and surface treatment (possibly including paving) shall be used as needed to prevent visible emissions from crossing beyond the lot line.

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

<u>Buildings With Vents:</u> There shall be no visible emissions from building vents. Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

<u>Sulfur Dioxide SO₂:</u> 500 parts per million by volume Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B). Authority for Requirement: 567 IAC 23.3(2)"a" (as revised 7/21/1999)

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
- 4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, University of Iowa (Main Power Plant) is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit

term, University of Iowa (Main Power Plant) shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

Section 112(j) of the Clean Air Act (MACT Hammer) Compliance Plan

Emission Units OD#1 through #4, 7, 8, 10, 11, PP43 and PP44 are of the source type regulated by the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (567 IAC 23.1(4)"dd", 40 CFR Part 63, Subpart DDDDD). On July 30, 2007, the DC Circuit Court vacated this entire standard. Since the standard has been vacated, the units may be subject to the requirements of section 112(j) of the Clean Air Act. Section 112(j) requires the facility to submit an application addressing the control of HAP emissions from these units and also requires that the MACT (Maximum Achievable Control Technology) be incorporated into the facility's Title V operating permit. The Iowa DNR - Air Quality Bureau is currently developing a procedure to implement Section 112(j) requirements, if applicable, for units that were subject to the vacated rule. If the facility is required to modify the units or control equipment to comply with section 112(j), then the facility shall submit an application to modify the required construction permit.

Authority for Requirement: 40 CFR 63.52; 567 IAC 23.1(4)"b"(2)

40 CFR 63 Subpart ZZZZ Requirements

The emergency generators at this facility (Emission Units 27 and EU-239-3-1) are subject to 40 CFR 63 Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines (RICE) NESHAP. Per 40 CFR 63.6590(b)(3), the existing compression ignition stationary RICE do not have to meet the requirements of subpart ZZZZ and of subpart A of part 63 and no initial notification is required.

Authority for Requirement: 40 CFR 63 Subpart ZZZZ

40 CFR 60 Subpart Dc Requirements

Emission Unit OD#1, one of the Oakdale Boilers is subject to NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial Institutional Steam Generating Units.

Authority for Requirement: 40 CFR 63 Subpart Dc

567 IAC 23.1(2)"III"

III. Emission Point-Specific Conditions

Facility Name: University of Iowa (Main Power Plant)

Permit Number: 00-TV-001R1-M001

Emission Point ID Number: EP-239-1

Associated Equipment

Associated Emission Unit ID Numbers: OD#1, OD#2, OD#3, OD#4

Emission Units vented through this Emission Point: OD#1, OD#2, OD#3, OD#4

Emission Unit Description: Oakdale Boiler #1, #2, #3, and #4

Raw Material/Fuel: Natural Gas Only

Rated Capacity: 15.4, 32.1, 32.1, and 20.3 MMBtu/hr, respectively

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40 %⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 78-A-023-S4

(1) An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit: 0.6 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(2)"b"(3)

Iowa DNR Construction Permit 78-A-023-S4

Pollutant: PM₁₀

Emission Limit(s): 0.76 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 78-A-023-S4

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Iowa DNR Construction Permit 78-A-023-S4

Pollutant: Nitrogen Oxides (NO_x) Emission Limit: 10.0 lb/MMBtu

Authority for Requirement: Iowa DNR Construction Permit 78-A-023-S4

NSPS Applicability

Boiler OD#1 is subject to NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial Institutional Steam Generating Units (beginning of 40 CFR §60.40c). Subject to the General Provisions of Subpart A.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- 1. These units shall be fired by natural gas only. Prior to burning any other fuel in these units, the permittee shall apply for, and obtain, a new construction permit from the Iowa DNR.
- 2. The maximum heat input for boiler #1 is 15.4 MMBTU/hr. The maximum heat input for boiler #2 is 32.1 MMBTU/hr. The maximum heat input for boiler #3 is 32.1 MMBTU/hr. The maximum heat input for boiler #4 is 20.3 MMBTU/hr.

Reporting & Record keeping: All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator shall maintain the following records:

1. In accordance with 40 CFR 60.48c(g), the permittee shall record and maintain records of the amounts of each fuel combusted during each day for boiler #1.

Authority for Requirement: Iowa DNR Construction Permit 78-A-023-S4

Emission Point Characteristics

This emission point shall conform to the conditions listed below.

Stack Height (feet): 90 Stack Opening (inches): 60

Exhaust Flow Rate (scfm): 41,100 Exhaust Temperature (°F): 450

Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permit 78-A-023-S4

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

<u>Requirements</u>

The owner/operator of this equipment shall comply with the monitoring below.	requirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EP-3

Associated Equipment

Associated Emission Unit ID Number: EU-3 Emissions Control Equipment ID Number: CE-3

Emissions Control Equipment Description: Low NO_x Burner

Continuous Emissions Monitors ID Numbers: ME-08a (NO_x) and ME-08b(CO₂)

Emission Unit vented through this Emission Point: EU-3

Emission Unit Description: Boiler No.7 Raw Material/Fuel: Natural Gas Only Rated Capacity: 218.0 MMBtu/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter Emission Limit: 0.2 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(2)"b"(3)

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x) Emission Limit: 0.10 lb/MMBtu

Authority for Requirement: 40 CFR 60 Subpart Db

Iowa DNR Construction Permit 91-A-064

Pollutant: Nitrogen Oxides (NO_x)

Emission Limit: 21.8 lb/hr based upon a steaming rate of 150,000 lb/hr and a heat input

of 218 MMBtu/hr

Authority for Requirement: Iowa DNR Construction Permit 91-A-064

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Natural gas shall be the only acceptable fuel for use in this unit.

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988 Iowa DNR Construction Permit 91-A-064

The owner/operator shall, on a daily basis, record the type(s) of fuel burned in this boiler and if other than natural gas is burned in this boiler in violation of this condition, the owner/operator shall also record the amount, sulfur content, and heating value of said other fuel type(s). This condition is only applicable when Boiler 11 is in operation. Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

This unit is an affected source under 40 CFR 63 Subpart DDDDD – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters. According to Sec. 63.7506(b), existing large gaseous fuel units are only subject to the initial notification requirements in Sec. 63.9(b). As specified in Sec. 63.7545(b), an initial notification must be submitted no later than March 12, 2005. University of Iowa (Main Power Plant) submitted an Initial Notification on March 14, 2005.

Authority for Requirement: 40 CFR 63 Subpart DDDDD

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Continuous Emissions Monitoring:

Pollutant - Nitrogen Oxides (NOx)
Operational Specifications - 40 CFR Part 60 Subpart Db
Initial System Calibration/Quality Assurance - April 10, 1997
Ongoing System Calibration/Quality Assurance - 40 CFR Part 60 Subpart Db
Reporting & Record keeping - 40 CFR Part 60. Submit all reports and petitions required by 40 CFR 60 to the Iowa DNR in order to demonstrate compliance with the NO_x emission limits.

Authority for Requirement: Iowa DNR Construction Permit 91-A-064 40 CFR 60 Subpart A and Subpart Db

Other Parameters

Pollutant – Carbon Dioxide (CO₂)
Operational Specifications - 40 CFR Part 60 Subpart Db
Initial System Calibration/Quality Assurance – April 10, 1997
Ongoing System Calibration/Quality Assurance - 40 CFR Part 60 Subpart Db
Reporting & Record keeping - 40 CFR Part 60. Submit all reports and petitions
required by 40 CFR 60 to the Iowa DNR in order to demonstrate
compliance with continuous emission monitoring
Authority for Requirement: Iowa DNR Construction Permit 91-A-064

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40 CFR Part 60 Subpart A and Subpart Db

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EP-4

Associated Equipment

Associated Emission Unit ID Number: EU-4 Emissions Control Equipment ID Number: CE-4

Emissions Control Equipment Description: Low NO_x Burner

Continuous Emissions Monitors ID Numbers: ME-09a (NO_X) and ME-09b (CO₂)

Emission Unit vented through this Emission Point: EU-4

Emission Unit Description: Boiler No.8 Raw Material/Fuel: Natural Gas Only Rated Capacity: 218.0 MMBtu/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter Emission Limit: 0.2 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(2)"b"(3)

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Nitrogen Oxides (NO_x) Emission Limit: 0.10 lb/MMBtu

Authority for Requirement: 40 CFR 60 Subpart Db

Iowa DNR Construction Permit 91-A-063

Pollutant: Nitrogen Oxides (NO_x)

Emission Limit: 21.8 lb/hr based upon a steaming rate of 150,000 lb/hr and a heat input

of 218 MMBtu/hr

Authority for Requirement: Iowa DNR Construction Permit 91-A-063

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Natural gas shall be the only acceptable fuel for use in this unit.

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Iowa DNR Construction Permit 91-A-063

The owner/operator shall, on a daily basis, record the type(s) of fuel burned in this boiler and if other than natural gas is burned in this boiler in violation of this condition, the owner/operator shall also record the amount, sulfur content, and heating value of said other fuel type(s). This condition is only applicable when Boiler 11 is in operation. Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

This unit is an affected source under 40 CFR 63 Subpart DDDDD – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters. According to Sec. 63.7506(b), existing large gaseous fuel units are only subject to the initial notification requirements in Sec. 63.9(b). As specified in Sec. 63.7545(b), an initial notification must be submitted no later than March 12, 2005. University of Iowa (Main Power Plant) submitted an Initial Notification on March 14, 2005.

Authority for Requirement: 40 CFR 63 Subpart DDDDD

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Continuous Emissions Monitoring:

Pollutant - Nitrogen Oxides (NOx)
Operational Specifications - 40 CFR Part 60 Subpart Db
Initial System Calibration/Quality Assurance - April 10, 1997
Ongoing System Calibration/Quality Assurance - 40 CFR Part 60 Subpart Db
Reporting & Record keeping - 40 CFR Part 60. Submit all reports and petitions required by 40 CFR 60 to the Iowa DNR in order to demonstrate compliance with the NO_x emission limits.

Authority for Requirement: Iowa DNR Construction Permit 91-A-063 40 CFR 60 Subpart A and Subpart Db

Other Parameters

Pollutant – Carbon Dioxide (CO₂)
Operational Specifications - 40 CFR Part 60 Subpart Db
Initial System Calibration/Quality Assurance – April 10, 1997
Ongoing System Calibration/Quality Assurance - 40 CFR Part 60 Subpart Db
Reporting & Record keeping - 40 CFR Part 60. Submit all reports and petitions required by 40 CFR 60 to the Iowa DNR in order to demonstrate compliance with continuous emission monitoring
Authority for Requirement: Iowa DNR Construction Permit 91-A-063
40 CFR Part 60 Subpart A and Subpart Db

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌	No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌	No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌	No 🖂
Authority for Requirement: 567 IAC 22.108(3)		

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Emission Point ID Number: EP-6

Associated Equipment

Associated Emission Unit ID Number: EU-6 Emissions Control Equipment ID Number: CE-6

Emissions Control Equipment Description: Electrostatic Precipitator

Emissions Control Equipment ID Number: CE-27

Emissions Control Equipment Description: Mechanical Dust Collector

Continuous Emissions Monitors ID Numbers: ME-1a (CO₂), ME-1c (SO₂) and

ME-6 (Opacity)

Emission Unit vented through this Emission Point: EU-6 Emission Unit Description: Boiler No.10, Spreader Stoker

Raw Material/Fuel: Coal, Tire Derived Fuel (TDF)

Rated Capacity: 206.3 MMBtu/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 75-A-282-S1

Pollutant: Particulate Matter Emission Limit: 0.6 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(2)"b"(2)

Iowa DNR Construction Permit 75-A-282-S1

Pollutant: Particulate Matter 10 microns and less (PM₁₀)

Emission Limit: 5.56 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 75-A-282-S1

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit: 6 lb/MMBtu (When Boiler 11 is not in operation)

Authority for Requirement: 567 IAC 23.3(3)"a"(3)

Iowa DNR Construction Permit 75-A-282-S1

Pollutant: Sulfur Dioxide (SO₂) Emission Limit: 627.14 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 75-A-282-S1

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit: 3.04 lb/MMBtu (When Boiler 11 is in operation)

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Iowa DNR Construction Permit 75-A-282-S1

Pollutant: Nitrogen Oxides (NO_x) Emission Limit: 92.62 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 75-A-282-S1

Pollutant: Carbon Monoxide (CO) Emission Limit: 42.14 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 75-A-282-S1

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

- 1. When Boiler 11 is in operation, Boiler 10 shall be limited to a SOx concentration of 3.04 lbs/MMBtu of heat input, rolling 3-hour average. When Boiler 11 is not operating, SOx emissions shall not exceed 6 lb/MMBtu of heat input, replicated maximum three-hour average.
- 2. Boiler 10 is limited to firing on bituminous coal and up to 8 percent tire derived fuel (TDF).
- 3. Boiler 10 is limited to a maximum heat input of 206.3 MMBtu/hr.
- 4. Maintain Electrostatic Precipitator, CE-06 and Mechanical Collector, CE-27 according to manufacturer's specifications and maintenance schedule.
- 5. All records required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.
- 6. Record on a daily basis, the percent of tire derived fuel (TDF) blended with coal for use in Boiler 10.
- 7. The owner/operator shall maintain sufficient records to demonstrate compliance with the heat input restriction on Boiler 10.
- 8. Record, on a monthly basis, all maintenance (if any) of the Electrostatic Precipitator, CE-06, and the Mechanical Collector, CE-27.

Authority for Requirement: Iowa DNR Construction Permit 75-A-282-S1 PSD Permit dated June 9, 1987 amended on January 19, 1988

NESHAP - Existing Solid Fuel Unit

40 CFR Part 63 Subpart DDDDD "National Emissions Standards for Hazardous Air Pollutant for Industrial, Commercial, and Institutional Boilers and Process Heaters". This boiler is an affected boiler as defined by this Subpart. This boiler is considered to be an "existing large solid fuel unit". University of Iowa (Main Power Plant) submitted an Initial Notification on March 14, 2005. University of Iowa (Main Power Plant) must comply with all applicable requirements of this subpart no later than September 13, 2007. Authority for Requirement: 40 CFR Part 63 Subpart DDDDD

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 198 feet Stack Opening, (inches, dia.): 80 inches

Exhaust Flow Rate (scfm): 47,100 scfm

Exhaust Temperature (°F): 340°F

Discharge Style: Vertical Unobstructed Discharge

Authority for Requirement: Iowa DNR Construction Permit 75-A-282-S1

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

Pollutant - Particulate Matter

First Stack Test to be completed by – October 25, 2006

Second Stack Test to be completed between – April 25, 2007 and April 25, 2008

Test Method - Iowa Compliance Sampling Manual Method 5

Authority for Requirement: 567 IAC 22.108(3)

Pollutant - PM-10

Stack Test to be completed by – October 25, 2007

Test Method – 40 CFR 51, Appendix M, 201A with 202 (or approved alternative)

Authority for Requirement: 567 IAC 22.108(3)

Pollutant - NO_x

Stack Test to be completed by - October 25, 2007

Test Method - Method 7E, 40 CFR 60

Authority for Requirement - 567 IAC 22.108(3)

Pollutant - CO

Stack Test to be completed by - October 25, 2007 Test Method - 40 CFR 60, Appendix A, Method 10 Authority for Requirement - 567 IAC 22.108(3)

Continuous Emissions Monitoring:

Pollutant - Opacity

Operational Specifications - 40 CFR Part 60 Subpart D

Initial System Calibration/Quality Assurance – September 21, 1983

Ongoing System Calibration/Quality Assurance - 40 CFR Part 60 Subpart D

Reporting & Record keeping - As found in 40 CFR Part 60 Subpart D. Submit all reports and petitions required by 40 CFR 60 to the Iowa DNR in order to demonstrate compliance with continuous emission monitoring and the 40% opacity (visible emissions) limit

Authority for Requirement: 40 CFR Part 60 Subpart D

PSD Permit dated June 9, 1987 amended in 1988

Pollutant - Sulfur Dioxide (SO₂) Operational Specifications – As found in 40 CFR Part 60 Subpart D Initial System Calibration/Quality Assurance – December 01, 1993 Ongoing System Calibration/Quality Assurance – As found in 40 CFR Part 60 Subpart D

Reporting & Record keeping – As found in 40 CFR Part 60 Subpart D. Submit all reports and petitions required by 40 CFR 60 to the Iowa DNR in order to demonstrate compliance with the 6 lb/MMBtu SO₂ emission limit for boiler 10 alone and 3.04 lb/MMBtu SO₂ emissions for boilers 10 and 11 in operation.

Authority for Requirement: PSD Permit dated June 9, 1987 amended in 1988

Other Parameters:

Pollutant – Carbon Dioxide (CO₂) or Oxygen (O₂).

Operational Specifications - 40 CFR Part 60 Subpart D

Initial System Calibration/Quality Assurance – December 06, 1993

Ongoing System Calibration/Quality Assurance - 40 CFR Part 60 Subpart D

Reporting & Record keeping - 40 CFR Part 60. Submit all reports and petitions required by 40 CFR 60 Subpart D to the Iowa DNR in order to demonstrate compliance with continuous emission monitoring

Authority for Requirement: PSD Permit dated June 9, 1987 amended in 1988

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required?	Yes No X
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring Plan Electrostatic Precipitator for PM Control

I. Background

A. Emissions Unit:

Description: Boiler No.10, Spreader Stoker

Identification: EU 06

Facility: University of Iowa (Main Power Plant)

B. Applicable Regulation, Emission Limit, and Monitoring Requirements:

Regulation No.: Iowa DNR Construction Permit 75-A-282-S1

Particulate emission limit: 0.6 lb/MMBtu PM, 5.56 lb/hr PM-10

Opacity emission limit: 40%

Current Monitoring requirements: Stack Testing

Continuous opacity monitoring system

(COMS)

Audible Precipitator Malfunction Alarm

C. <u>Control Technology</u>: Electrostatic Precipitator

II. Monitoring Approach

A. Indicators	Opacity of ESP exhaust	Visual and Audible Precipitator
		Malfunction Alarm
B. Measurement Approach	COMS in ESP exhaust	The audible alarm will
		continuously monitor T-R set
		failure and rapper control
		malfunction. Visual indicators on
		the ESP panel board and in the
		plant computer control system
		(DCS) will also display upon T-R
		set failure and rapper control
		malfunction. Operations crews
		perform regular shift inspections
		of the ESP collection hoppers to
		make sure they are emptying.
C. Indicator Range	When the opacity exceeds	The precipitator malfunction
	25% over any 6-minute	alarm will activate if any of the
	average, corrective action	ash hoppers become full. It will
	will be implemented within	also activate for short circuit
	8 hours. An exceedance of	situations such as a loose wire
	the 40% opacity limit is	and to indicate improper rapper
	considered a violation, and	functions. Corrective action
	shall be reported as required	measures will be implemented on
	in General Condition G14.	the occurrence of a precipitator
		malfunction alarm. The
		appropriate measures for
		remediation will be implemented
		within 8 hours.

D. Performance Criteria 1. Data Representativeness	Install the COMS at a representative location in the ESP exhaust per 40 CFR 60, Appendix B, Performance Specification 1 (PS-1).	Rapper system operation, T-R set operation and ash removal system operation are indicators of the proper electro-mechanical operation of the electrostatic precipitator. An audible and visual alarm will continuously monitor T-R set failure and rapper control health. Weekly inspection of the rapper system operation and daily inspections of the ash removal system provides additional assurance of proper electro-mechanical operation of
2. Verification of Operational Status	Results of COMS performance evaluation conducted per PS-1 (May 12, 2005).	the electrostatic precipitator.
3. QA/QC Practices/Criteria	The currently installed COMS was installed and evaluated per PS-1 on May 12, 2005. The continuous opacity monitor will be automatically calibrated for zero and span adjustments daily.	All instruments and control equipment will be calibrated, maintained, and operated according to the manufactures specifications.
4. Monitoring Frequency	Monitor the opacity of the ESP exhaust continuously (every 10 seconds).	 An audible and visual alarm will continuously monitor T-R set failure and rapper control malfunction. Daily: Inspection of ash removal system operation. Random T-R set failure and rapper failure will not significantly affect precipitator performance. Failure of one T-R set or 10% of the rappers per precipitator section is an abnormal condition. Weekly: Inspection of rapper operation. Inspection of T-R set operation.

F	1	_
		 Each Major Scheduled Unit Outage Lasting Four or More Weeks: Check and correct plate electrode alignment. Inspect for collection surface fouling. Inspect T-R set mechanical condition. Inspect internal structural components.
5. Data Collection Procedures	Set up the data acquisition system (DAS) to retain all 6-minute and hourly average opacity data.	Maintain opacity reports, supporting data, all inspection records, and any action resulting from the inspection for 5 years and available upon request. Opacity data is maintained through a continuous emissions monitoring system (CEMS). Maintenance information is maintained through a computerized maintenance system (PMC).
6. Averaging Period	Use the 10-second opacity data to calculate 6-minute averages. Use the 6-minute averages to calculate the hourly block average opacity.	None.

Compliance Assurance Monitoring Plan Multiclone for PM Control

I. Background

A. Emissions Unit:

Description: Boiler No.10, Spreader Stoker

Identification: EU 06

Facility: University of Iowa (Main Power Plant)

B. Applicable Regulation, Emission Limit, and Monitoring Requirements:

Regulation No.: Iowa DNR Construction Permit 75-A-282-S1

Particulate emission limit: 0.6 lb/MMBtu PM, 5.56 lb/hr PM-10

Opacity emission limit: 40%

Current Monitoring requirements: Stack Testing

Continuous opacity monitoring system

Physical inspection

C. <u>Control Technology</u>: Multiclone system

II. Monitoring Approach

A. Indicators	Opacity of ESP exhaust	Physical Inspections of multiclone system
B. Measurement Approach	COMS in ESP exhaust	Inspection of sight glasses and vacuum gauges to ensure ash is flowing properly.
C. Indicator Range	When the opacity exceeds 25% over any 6-minute average, corrective action will be implemented within 8 hours. An exceedance of the 40% opacity limit is considered a violation, and shall be reported as required in General Condition G14.	Corrective action measures will be implemented on the occurrence of an inspection indicating no flow from the ash hoppers below the multiclones. The appropriate measures for remediation will be implemented within 8 hours.
D. Performance Criteria 1. Data Representativeness	Install the COMS at a representative location in the ESP exhaust per 40 CFR 60, Appendix B, Performance Specification 1 (PS-1).	Periodic observations of the site glasses and the ash vacuum gauge to ensure the multiclones and ash hoppers have not become plugged.
Verification of Operational Status	Results of COMS performance evaluation conducted per PS-1 (May 12, 2005).	
3. QA/QC Practices/Criteria	The currently installed COMS was installed and evaluated per PS-1 on May 12, 2005. The continuous opacity monitor will	All instruments and control equipment will be calibrated, maintained, and operated according to the manufacturer's

	be automatically calibrated for zero and span adjustments daily.	specifications.
4. Monitoring Frequency	Monitor the opacity of the ESP exhaust continuously (every 10 seconds).	Physical Inspections. Each Major Scheduled Unit Outage Lasting Four or More Weeks: Clean multiclone spinner vanes Inspect for wear on rings and spinner vanes. If worn rings and/or spinner vanes are detected, the appropriate measures for remediation will be implemented
5. Data Collection Procedures	Set up the data acquisition system (DAS) to retain all 6-minute and hourly average opacity data.	in a timely manner. Maintain opacity reports, supporting data, all inspection records, and any action resulting from the inspection for 5 years and available upon request. Opacity data is maintained through a continuous emissions monitoring system (CEMS). Maintenance information is maintained through a computerized maintenance system (PMC).
6. Averaging Period	Use the 10-second opacity data to calculate 6-minute averages. Use the 6-minute averages to calculate the hourly block average opacity.	None.

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Emission Point ID Number: EP-7

Associated Equipment

Associated Emission Unit ID Number: EU-7 Emissions Control Equipment ID Number: CE-7 Emissions Control Equipment Description: Baghouse Emissions Control Equipment ID Number: CE-28

Emissions Control Equipment Description: Fluidized Bed (Pulverized Limestone Injection) Continuous Emissions Monitors ID Numbers: ME-7a (SO₂), ME-7b (NO_x), ME-7c (Opacity)

and ME-7d (O_2)

Emission Unit vented through this Emission Point: EU-7 Emission Unit Description: Boiler No.11, Fluidized Bed Raw Material/Fuel: Coal, Natural Gas and Oat Hulls

Rated Capacity: 223.0 MMBtu/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 10 %*

*Except for one 6-minute period per hour of not more than 20% opacity

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Iowa DNR construction permit 95-A-438-S1

Pollutant: Particulate Matter (PM) Emission Limit: 0.03 lb/MMBtu

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Iowa DNR construction permit 95-A-438-S1

Pollutant: Particulate Matter (PM)

Emission Limit: 6.69 lb/hr

Authority for Requirement: Iowa DNR construction permit 95-A-438-S1

Pollutant: Sulfur Dioxide (SO₂) Emission Limit: 223 lb/hr

Authority for Requirement: Iowa DNR construction permit 95-A-438-S1

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit: 1.0 lb/MMBtu, 3-hour rolling average

(Not to exceed ten percent of the potential emissions based on sulfur input,

30-day rolling average as in EPA Method 19.)

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Iowa DNR construction permit 95-A-438-S1

40 CFR 60 Subpart Db

Pollutant: Nitrogen Oxides (NO_x)

Emission Limit: 0.40 lb/MMBtu, 30-day rolling average

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Iowa DNR construction permit 95-A-438-S1

Pollutant: Nitrogen Oxides (NO_x)

Emission Limit: 89.2 lb/hr

Authority for Requirement: Iowa DNR construction permit 95-A-438-S1

Pollutant: Carbon Monoxide (CO) Emission Limit: 0.30 lb/MMBtu

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Iowa DNR construction permit 95-A-438-S1

Pollutant: Fluorides (F)

Emission Limit: 0.004507 lb/MMBtu

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Pollutant: Beryllium (Be)

Emission Limit: 0.0000069 lb/MMBtu

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

The unit may combust coal, or coal and up to 80% by weight oat hulls, with natural gas startup.

Authority for Requirement: Iowa DNR construction permit 95-A-438-S1

This boiler is limited to a maximum heat input of 223 million Btu per hour (MMBtu/hr) Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

The Owner/Operator must demonstrate at least a 90 percent reduction of the potential SO_2 emission rate with a 30 day rolling average. The potential SO_2 emission rate means the theoretical emissions (lb/MMBtu heat input) that would result from the combustion of the fuel in the boiler without SO_2 adsorption. There shall be no crediting for fuel pretreatment. The Owner/Operator shall use 40 CFR 60 Appendix 'A' Method 19 to determine potential SO_2 emissions.

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988 40 CFR 60 Subpart Db

NESHAP - Existing Solid Fuel Unit

40 CFR Part 63 Subpart DDDDD "National Emissions Standards for Hazardous Air Pollutant for Industrial, Commercial, and Institutional Boilers and Process Heaters". This boiler is an affected boiler as defined by this Subpart. This boiler is considered to be an "existing large solid fuel unit". University of Iowa (Main Power Plant) submitted an Initial

Notification on March 14, 2005. University of Iowa (Main Power Plant) must comply with all applicable requirements of this subpart no later than September 13, 2007. Authority for Requirement: 40 CFR Part 63 Subpart DDDDD

Emission Point Characteristics

The source shall be connected to the stack designated below.

Stack Height (feet): 198 feet

Stack Opening (inches, dia.): 60 inches Exhaust Flow Rate (acfm): 74,150 acfm Exhaust Temperature (°F): 250 °F Discharge Style: Vertical, Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 95-A-438-S1

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

The Be and F content shall be determined by the owner/operator for the coal burned during each Reference Method 104 compliance testing of the herein-approved boiler. The coal sample shall be "representative" of the coal burned during the test. The compliance test method for beryllium (Be) shall be Reference Method 104 of 40 CFR Part 61, Appendix B. The agency will set forth the test method for fluoride (F) and the test procedures for Be and F before, at, or after the pretest meeting required by Condition 4 of the PSD Permit dated June 9, 1987, amended on January 19, 1988.²

During the initial Be and F compliance test(s), the owner/operator shall obtain a coal sample for subsequent determination of the Be and F content of the coal burned in Boiler 11. The Be and F content of said coal samples(s) shall be reported in the initial compliance test report. Analytical methods for Be and F must be approved beforehand by the EPA. After the initial compliance tests, the owner/operator shall collect a 24-hour representative coal sample at a frequency of at least once every two weeks and whenever a change of coal supply is made by the owner/operator. Coal sampling and analyses (CSA) under this condition is not required if the subject boiler is not operated during the two-week period or if the boiler is operated on a fuel other than coal. Each composite sample shall meet the sampling requirements for special purpose sampling of ASTM D2234-76. In addition, the composite sample collection classification shall meet Type I, Condition A, B, or C, with systematic spacing, as defined by ASTM D2234-76. The composite sample shall be collected as close to an "as fired" condition as practicable. The proposed location, sampling, and analytical collection methodology shall be submitted to the EPA regional office for approval prior to operation of Boiler 11.

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² All initial testing and pretests already occurred at the time of the Operating permit issuance.

For each coal sample collected after the initial compliance test, the owner/operator shall obtain an analysis of Be and F content within two (2) weeks of sample collection.

After the first operating year of the PSD-approved Boiler, the owner/operator may request a revision of (including the elimination of) the Be and/or F monitoring frequency if a lesser frequency appears appropriate. On its own accord, the EPA may also revise the frequency (and/or the CSA procedures of this condition) if it determines that a revision is needed for verification of compliance with the Be and F emission limits of Condition 1.

The Be and F concentrations that are determined through the above sampling and analyses procedures shall serve as an indicator of probable compliance (or noncompliance) with the BACT emission limit. When requested to do so by the EPA regional office, a formal verification of compliance through stack testing of boiler emissions (with subsequent submittal of a report of the test) shall be conducted by the owner/operator at the owner/operator's expense.

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

The owner or operator shall keep records of control equipment inspections and maintenance. Authority for Requirement: Iowa DNR Construction Permit 95-A-438-S1

Stack Testing:

Pollutant - Particulate Matter (PM) Stack Test to be completed by – October 25, 2007 Test Method – Iowa Compliance Sampling Method 5 Authority for Requirement: 567 IAC 22.108(3)

Pollutant - CO Stack Test to be completed by - October 25, 2007 Test Method - 40 CFR 60, Appendix A, Method 10 Authority for Requirement - 567 IAC 22.108(3)

Continuous Emissions Monitoring:

Pollutant - Opacity
Operational Specifications - 40 CFR Part 60 Subpart Db
Initial System Calibration/Quality Assurance – February 18, 1997
Ongoing System Calibration/Quality Assurance - 40 CFR Part 60 Subpart Db
Reporting & Record Keeping - 40 CFR Part 60 Subpart Db and Subpart A, Submit all
reports and petitions required by 40 CFR 60 to the Iowa DNR in order to
demonstrate compliance with the 10% opacity (visible emissions) limit.
Authority for Requirement: PSD Permit dated June 9, 1987 amended on Jan. 19, 1988
Iowa DNR Construction Permit 95-A-438-S1

Pollutant - Sulfur Dioxide (SO₂)
Operational Specifications - 40 CFR Part 60 Subpart Db
Initial System Calibration/Quality Assurance - December 01, 1993
Ongoing System Calibration/Quality Assurance - 40 CFR Part 60 Subpart Db
Reporting & Record Keeping - Submit all reports and petitions required by 40 CFR
Part 60 to the Iowa DNR in order to demonstrate compliance with the SO₂ emission limit.

Authority for Requirement: PSD Permit dated June 9, 1987 amended on Jan. 19, 1988 40 CFR 60 Subpart Db Iowa DNR Construction Permit 95-A-438-S1

Pollutant - Nitrogen Oxides (NOx) Operational Specifications - 40 CFR Part 60 Initial System Calibration/Quality Assurance – December 01, 1993 Ongoing System Calibration/Quality Assurance - 40 CFR Part 60

Reporting & Record Keeping - 40 CFR Part 60, Submit all reports and petitions required by 40 CFR 60 to the Iowa DNR in order to demonstrate compliance with NO_x limit.

Authority for Requirement: PSD Permit dated June 9, 1987 amended on Jan. 19, 1988 40 CFR 60 Subpart Db Iowa DNR Construction Permit 95-A-438-S1

Other Parameters

Pollutant - Other – Carbon Dioxide (CO_2) or Oxygen (O_2) Operational Specifications - 40 CFR Part 60 Subpart Db Initial System Calibration/Quality Assurance – December 01, 1993 Ongoing System Calibration/Quality Assurance - 40 CFR Part 60 Subpart Db Reporting & Record Keeping - Submit all reports and petitions required by 40 CFR 60 to the Iowa DNR in order to demonstrate compliance Authority for Requirement: PSD Permit dated June 9, 1987 amended on Jan. 19, 1988 40 CFR 60 Subpart Db

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Relevant requirements of O & M plan for this equipment: Particular	Yes No nate Matter
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

Baghouse Agency Operation & Maintenance Plan

Facility: University of Iowa Main Power Plant

EIQ Number: 92-5191

Emission Unit: EU7 Boiler 11

Emission Point: EP7 Boiler 11 Smokestack

Control Equipment: CE7 Baghouse

Monitoring Guidelines

The University of Iowa Main Power Plant is committed to taking timely corrective action during periods of excursion where the indicators are out of range. A corrective action may include an investigation of the reason for the excursion, evaluation of the situation and necessary follow-up action to return operation to normal, or to restore the indicator to normal range.

An excursion does not necessarily indicate a violation of an applicable requirement. If the corrective action measures fail to return the indicators to the appropriate range, the facility will report the exceedance to the department and conduct source testing within 90 days of the exceedance to demonstrate compliance with applicable requirements. If the test demonstrates compliance with emission limits then new indicator ranges must be set for monitoring and the new ranges must be incorporated in the operating permit. If the test demonstrates noncompliance with emission limits, then the facility, within 60 days, proposes a schedule to implement corrective action to bring the source into compliance and demonstrate compliance.

MONITORING METHODS AND CORRECTIVE ACTION

General

Monitoring is not required during periods of time greater than one day in which Boiler 11 does not operate.

Routine Operations

Daily baghouse operating requirements include monitoring and evaluation of various parameters, recordkeeping, preventative maintenance, and the appropriate response to any malfunctions. Fly ash collected by the baghouse is removed from hoppers on the bottom of the baghouse by a pneumatic ash conveying system.

Preventative Maintenance

The power plant uses a computerized maintenance management system (CMMS) to schedule all preventive maintenance tasks and track corrective maintenance history. The following preventative maintenance tasks will be programmed into the CMMS and work orders generated for performing these maintenance tasks.

Weekly

- Inspect differential pressure across the bags, for each of the 6 compartments in the baghouse. Confirm pressure is within the manufacturer's recommended operating range.
- Inspect compressed air pulsing system for any abnormal conditions.
- Inspect hopper gates and piping for signs of jamming, leaks, wear or broken parts.

Annually

• Inspect baghouse compartments during annual outage.

Equipment Monitoring Methods

Performance of the baghouse may be monitored by observing differential pressure readings on various operator interface screens for boiler 11. Additionally, the status of the on-line cleaning system is available on operator interface screens and a local panel in the boiler room. Continuous opacity monitoring is recorded in the continuous emissions monitor data acquisitions system (CEM DAS) and displayed on the CEM DAS operator interface. Boiler 11 opacity is also displayed on the control system operator interface screens. Alarms are provided on the control system operator interface for high baghouse differential pressure, high baghouse inlet and high baghouse outlet temperatures, and general baghouse trouble.

Performance Criteria

Baghouse performance assessments may be accomplished by reviewing the CEM DAS operator interface and Boiler 11 daily opacity report and monitoring boiler 11 operator interfaces. Certain boiler transients produce temporary baghouse differential pressure excursions. Examples include sootblowing operations and rapid changes in boiler load. However, these transients should not produce a noticeable change in opacity.

Recordkeeping and Reporting

Operational records will be kept and maintained at the power plant for a period of five years and will be available for review upon request by the DNR. Records to be kept include:

- Boiler 11 CEMDAS daily opacity report.
- Boiler 11 operator logs.
- Preventative and corrective maintenance history will be maintained in the power plant CMMS
- Reports Semi-annual reports will be generated that include times and duration of all
 instances of data recorded that were outside of an indicated performance range. The
 report will also include a certification that corrective actions were promptly taken or a
 statement that all readings were within the performance range.
- Submit all reports and petitions required by 40 CFR 60 to the Iowa DNR in order to demonstrate compliance with continuous emission monitoring.
- A spare parts inventory will be maintained at the facility.

Quality Control

The following quality control measures will be implemented in association with the operation of the boiler 11 baghouse:

- All instruments and equipment will be calibrated, maintained, and operated according to manufacturer specifications.
- Any visible emission in excess of 10 percent, except for one six-minute period per hour of not more than 20 percent, will be reported and corrective action will be taken to correct the problem.

This Operation and Maintenance Plan will be available for review at the power plant.

Emission Point ID Numbers: PP43, PP44

Associated Equipment

Associated Emission Unit ID Numbers: PP43 and PP44

Emissions Control Equipment ID Number: CE PP43 and CE PP44 Emissions Control Equipment Description: Low NOx Burners

Emission Units vented through these Emission Points: PP43 and PP44 Emission Unit Description: Temporary Boilers 1 and 2, respectively

Raw Material/Fuel: Natural Gas Rated Capacity: 93 MMBtu/hr each

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40 %⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 06-A-778 (PP43) and 06-A-779

(PP44)

(1) An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit: 0.6 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(2)"b"

Iowa DNR Construction Permits 06-A-778 (PP43) and 06-A-779

(PP44)

Pollutant: Particulate Matter Emission Limit: 1.0 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 06-A-778 (PP43) and 06-A-779

(PP44)

Pollutant: PM₁₀

Emission Limit(s): 1.0 lb./hr

Authority for Requirement: Iowa DNR Construction Permits 06-A-778 (PP43) and 06-A-779

(PP44)

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Iowa DNR Construction Permits 06-A-778 (PP43) and 06-A-779

(PP44)

Pollutant: Nitrogen Oxides (NO_x)

Emission Limit: 4.20 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 06-A-778 (PP43) and 06-A-779

(PP44)

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: 2.00 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 06-A-778 (PP43) and 06-A-779

(PP44)

Pollutant: Carbon Monoxide (CO)

Emission Limit: 6.00 lb/hr and 400 ppmv

Authority for Requirement: Iowa DNR Construction Permits 06-A-778 (PP43) and 06-A-779

(PP44)

NSPS Applicability

The boilers are subject to NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial Institutional Steam Generating Units (beginning of 40 CFR §60.40c). Subject to the General Provisions of Subpart A.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

1. These units shall be limited to the use of natural gas only.

Reporting & Record keeping: All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator shall maintain the following records:

1. Maintain a record of the type of fuel used (i.e. a fuel bill).

Authority for Requirement: Iowa DNR Construction Permits 06-A-778 (PP43) and 06-A-779 (PP44)

Emission Point Characteristics

These emission points shall conform to the conditions listed below.

Stack Height (feet): 55 Stack Opening (inches): 42

Exhaust Flow Rate (scfm): 18,568 Exhaust Temperature (°F): 575

Discharge Style: Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permits 06-A-778 (PP43) and 06-A-779

(PP44)

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes ☐ No ⊠

Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EP-8

Associated Equipment

Associated Emission Unit ID Number: EU-8 Emissions Control Equipment ID Number: CE-8

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-8

Emission Unit Description: Coal Crusher No.1

Raw Material/Fuel: Coal Rated Capacity: 150 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: No visible emissions

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

This emission unit is subject to 40 CFR 60 Subpart Y, 20 percent opacity, but is superseded by the 'no visible emissions' requirement in the PSD permit.

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible emissions shall be observed on a weekly basis to ensure none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emissions readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	
a minimum of five years.	
Maintain a written record of the observation and any action resulting from	the observation for

Compliance Assurance Monitoring (CAM) Plan Required? Yes \square No \boxtimes

Facility Maintained Operation & Maintenance Plan Required?

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

Yes No No

Associated Equipment

Associated Emission Unit ID Number: EU-9 Emissions Control Equipment ID Number: CE-9

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-9

Emission Unit Description: Coal Crusher No.2

Raw Material/Fuel: Coal Rated Capacity: 150 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: No visible emissions

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

This emission unit is subject to 40 CFR 60 Subpart Y, 20 percent opacity, but is superseded by the 'no visible emissions' requirement in the PSD permit.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible emissions shall be observed on a weekly basis to ensure none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emissions readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Authority for Requirement: 567 IAC 22.108(3)	
a minimum of five years.	
Maintain a written record of the observation and any action resulting from	n the observation for

Compliance Assurance Monitoring (CAM) Plan Required? Yes \square No \boxtimes

Facility Maintained Operation & Maintenance Plan Required?

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

Yes No No

Associated Equipment

Associated Emission Unit ID Number: EU-10 Emissions Control Equipment ID Number: CE-10

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-10

Emission Unit Description: Coal Silo No.1

Raw Material/Fuel: Coal Rated Capacity: 150 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes ☐ No ⊠

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Associated Emission Unit ID Number: EU-11 Emissions Control Equipment ID Number: CE-11

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-11

Emission Unit Description: Coal Silo No.2

Raw Material/Fuel: Coal Rated Capacity: 150 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes No No

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Associated Emission Unit ID Number: EU-12 Emissions Control Equipment ID Number: CE-12

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-12

Emission Unit Description: Coal Silo No.3

Raw Material/Fuel: Coal Rated Capacity: 300 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: No visible emissions

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

This emission unit is subject to 40 CFR 60 Subpart Y, 20 percent opacity, but is superseded by the 'no visible emissions' requirement in the PSD permit.

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible emissions shall be observed on a weekly basis to ensure none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emissions readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Authority for Requirement: 567 IAC 22.108(3)	
a minimum of five years.	
Maintain a written record of the observation and any action resulting from	the observation for

 Agency Approved Operation & Maintenance Plan Required?
 Yes □ No ⋈

 Facility Maintained Operation & Maintenance Plan Required?
 Yes ⋈ No □

 Compliance Assurance Monitoring (CAM) Plan Required?
 Yes □ No ⋈

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Associated Emission Unit ID Number: EU-13 Emissions Control Equipment ID Number: CE-13

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-13

Emission Unit Description: Limestone Silo

Raw Material/Fuel: Limestone Rated Capacity: 18.8 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 5 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 94-A-199

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Particulate Matter 10 microns and less (PM₁₀)

Emission Limit: 0.16 lb/hr, 0.70 ton/yr

Authority for Requirement: Iowa DNR Construction Permit 94-A-199

Emission Point Characteristics

This emission point shall conform to the conditions listed below.

Stack Height (feet): 110

Stack Opening (inches): 18 x 24 (rectangular)

Exhaust Flow Rate (scfm): 700 Exhaust Temperature (°F): 70 Discharge Style: Wall Vent

Authority for Requirement: Iowa DNR Construction Permit 94-A-199

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible Emission Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (> 5 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Authority for Requirement: 567 IAC 22.108(14)	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🗌

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Associated Emission Unit ID Number: EU-14a Emissions Control Equipment ID Number: CE-14a1 Emissions Control Equipment Description: Bag Filter

Emission Unit vented through this Emission Point: EU-14a

Emission Unit Description: Ash Silo

Raw Material/Fuel: Ash Rated Capacity: 4 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: No visible emissions

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible emissions shall be observed on a weekly basis to ensure none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emissions readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Associated Emission Unit ID Number: EU-14a Emissions Control Equipment ID Number: CE-14a2 Emissions Control Equipment Description: Bag Filter

Emission Unit vented through this Emission Point: EU-14a

Emission Unit Description: Ash Silo

Raw Material/Fuel: Ash Rated Capacity: 4 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: No visible emissions

Authority for Requirement: PSD Permit dated June 9, 1987 amended on January 19, 1988

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible emissions shall be observed on a weekly basis to ensure none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake visible emissions readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Associated Emission Unit ID Number: EU-14b Emissions Control Equipment ID Number: CE-14b

Emissions Control Equipment Description: Bin Vent Filter

Emission Unit vented through this Emission Point: EU-14 Emission Unit Description: Ash Conveying System

Raw Material/Fuel: Fly Ash Rated Capacity: 1.3 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 5 %

Authority for Requirement: 567 IAC 22.3(3)

Iowa DNR Construction Permit 96-A-1125

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 96-A-1125

Pollutant: Particulate Matter 10 microns and less (PM₁₀)

Emission Limit: 0.45 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 96-A-1125

Emission Point Characteristics

This emission point shall conform to the conditions listed below.

Stack Height (feet): 166 Stack Opening (inches): 14 Exhaust Flow Rate (scfm): 2600 Exhaust Temperature (°F): 100

Discharge Style: Vertical, Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 96-A-1125

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible Emission Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (> 5 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Authority for Requirement: 567 IAC 22.108(14)	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Associated Emission Unit ID Number: EU-17 Emissions Control Equipment ID Number: CE-17

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-17

Emission Unit Description: North Coal Bunker

Raw Material/Fuel: Coal Rated Capacity: 50 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 20 %

Authority for Requirement: 40 CFR 60 Subpart Y

Pollutant: Particulate Matter Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible Emission Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (> 20 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Associated Emission Unit ID Number: EU-18 Emissions Control Equipment ID Number: CE-18

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-18

Emission Unit Description: South Coal Bunker

Raw Material/Fuel: Coal Rated Capacity: 50 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 20 %

Authority for Requirement: 40 CFR 60 Subpart Y

Pollutant: Particulate Matter Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible Emission Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (> 20%) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Associated Equipment

Associated Emission Unit ID Number: EU-239-3-1

Emission Unit vented through this Emission Point: EU-239-3-1

Emission Unit Description: Oakdale Power Plant Emergency Generator

Raw Material/Fuel: Diesel Fuel Rated Capacity: 20 gal/hr, 465 Bhp

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40%⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 04-A-428

⁽¹⁾ An exceedence of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit: 0.10 lb/MMBtu

Authority for Requirement: Iowa DNR Construction Permit 04-A-428

Pollutant: PM₁₀

Emission Limit(s): 1.1 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 04-A-428

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3)"b"(2)

Iowa DNR Construction Permit 04-A-428

NESHAP

40 CFR Part 63 Subpart ZZZZ "Reciprocating Internal Combustion Engines".

This generator is an affected reciprocating internal combustion engine as defined by this Subpart. However, per 40 CFR 63.6590(b)(3), existing compression ignition stationary RICE do not have to meet the requirements of subpart ZZZZ and of subpart A of part 63. No initial notification is required.

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZ

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Hours of operation:

1. The use of the generator shall not exceed 500 hours per 12-month rolling total.

Process throughput:

- 1. The fuel shall be limited to #1 or #2 distillate fuel only.
- 2. The sulfur content of the fuel shall not exceed 0.5% by weight.

Reporting & Record keeping: All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator shall maintain the following records:

- 1. Record the type of fuel used and the sulfur content of the fuel.
- 2. Record the monthly usage of the generator, in hours.
- 3. Annual generator usage shall be determined on a 12-month rolling basis for each month of operation.

Authority for Requirement: Iowa DNR Construction Permit 04-A-428

Emission Point Characteristics

This emission point shall conform to the conditions listed below.

Stack Height: 7 feet 10 in Stack Opening (inches): 5

Exhaust Flow Rate (acfm): 15,337 Exhaust Temperature (°F): 900

Discharge Style: Vertical, Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 04-A-428

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
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Authority for Requirement: 567 IAC 22.108(3)

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Associated Equipment

Associated Emission Unit ID Number: EU-27

Emission Unit vented through this Emission Point: EU-27

Emission Unit Description: Emergency Diesel Generator No.7 (2347 Brake Horsepower)

Raw Material/Fuel: #2 Fuel Oil

Rated Capacity: 126.5 gal/hr, 1750 kW

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 20%

Authority for Requirement: Iowa DNR Construction Permit 97-A-1035

Pollutant: Particulate Matter Emission Limit: 0.10 lb/MMBtu

Authority for Requirement: Iowa DNR Construction Permit 97-A-1035

Pollutant: Sulfur Dioxide (SO₂) Emission Limit(s): 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3)"b"(2)

Iowa DNR Construction Permit 97-A-1035

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

The fuel used by this source shall be limited to No.2 diesel fuel.

Operation of this source shall not exceed 1500 hours per 12 month period rolled monthly. Authority for Requirement: Iowa DNR Construction Permit 97-A-1035

No person shall allow, cause, or permit the combustion of No.1 or No.2 fuel oil exceeding a sulfur content of 0.5 percent.

Authority for Requirement: 567 IAC 23.3(3)"b"(1)

The Owner /Operator shall monitor the percent of sulfur in the diesel fuel as delivered to accurately track the SO_x emissions. The sulfur content can be vendor supplied (such as a bill of lading) or facility generated.

Reporting & Recordkeeping: This facility shall maintain the following records onsite for a minimum of five (5) years:

Monthly recordkeeping rolled monthly on the number of hours this unit has operated. Documentation supporting the sulfur content of the fuel used is below 0.5 percent. Authority for Requirement: 567 IAC 22.108(3)

NESHAP

40 CFR Part 63 Subpart ZZZZ "Reciprocating Internal Combustion Engines".

This generator is an affected reciprocating internal combustion engine as defined by this Subpart. However, per 40 CFR 63.6590(b)(3), existing compression ignition stationary RICE do not have to meet the requirements of subpart ZZZZ and of subpart A of part 63. No initial notification is required.

Authority for Requirement: 40 CFR Part 63 Subpart ZZZZ

Emission Point Characteristics

This emission point shall conform to the conditions listed below.

Stack Height (feet): 120 Stack Opening (inches): 16

Exhaust Flow Rate (acfm): 15,337 Exhaust Temperature (°F): 994

Discharge Style: Vertical, Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 97-A-1035

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible Emission Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (> 20%) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from a minimum of five years.	the observation for
Authority for Requirement: 567 IAC 22.108(14)	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Emission Point ID Number: EP-28 (Fugitive)

Associated Equipment

Associated Emission Unit ID Number: EU-28

Emission Unit vented through this Emission Point: EU-28

Emission Unit Description: Coal Unloading Pit

Raw Material/Fuel: Coal Rated Capacity: 300 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 20 %

Authority for Requirement: 40 CFR 60 Subpart Y

Pollutant: Fugitive Dust

Emission Limits: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Associated Equipment

Associated Emission Unit ID Number: EU-30, 31 and 32

Emissions Control Equipment ID Number: CE-24 Emissions Control Equipment Description: Baghouse

Emission Unit vented through this Emission Point: EU-30, 31 and 32

Emission Unit Description: EU-30, Minibunker 11, EU-31, Coal Crusher No.3,

EU-32, Coal Crusher No.4

Raw Material/Fuel: Coal

Rated Capacity: EU-30, 50.0 ton/hr, EU-31, 50.0 ton/hr, EU-32, 50.0 ton/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 0 %

Authority for Requirement: Iowa DNR Construction Permit 95-A-439

Pollutant: Particulate Matter (PM)

Emission Limit: 0.02 gr/dscf, 0.17 lb/hr, 0.75 ton/yr Authority for Requirement: 567 IAC 23.3(2)"a"

Iowa DNR Construction Permit 95-A-439

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

This emission unit is subject to 40 CFR 60 Subpart Y, 20 percent opacity, but is superseded by the zero percent requirement in the construction permit.

Authority for Requirement: Iowa DNR Construction Permit 95-A-439

Emission Point Characteristics

This emission point shall conform to the conditions listed below.

Stack Height, (feet): 98 Stack Opening, (inches): 10 Exhaust Flow Rate (dscfm): 1000 Exhaust Temperature (°F): 70° Discharge Style: Horizontal

Authority for Requirement: Iowa DNR Construction Permit 95-A-439

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined

that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible Emission Monitoring:

Authority for Requirement: 567 IAC 22.108(3)

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (>0~%) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Authority for Requirement: 567 IAC 22.108(14)	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Associated Equipment

Associated Emission Unit ID Numbers: EU-40 Emissions Control Equipment ID Number: CE-40

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-40

Emission Unit Description: Biomass Silo

Raw Material/Fuel: Oat Hulls Rated Capacity: 25.00 ton/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 03-A-1149-S1

(1) An exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: 567 IAC 23.4(7)

Iowa DNR Construction Permit 03-A-1149-S1

Pollutant: PM-10

Emission Limit(s): 0.15 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 03-A-1149-S1

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

The owner or operator shall inspect and maintain the dust collector according to manufacturer's recommendations.

The owner or operator shall keep records of control equipment inspections and maintenance.

Authority for Requirement: Iowa DNR Construction Permit 03-A-1149-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 80.5

Stack Opening, (inches, dia.): 12 inches by 12 inches

Exhaust Flow Rate (scfm): 1695 Exhaust Temperature (°F): Ambient Discharge Style: Horizontal Discharge

Authority for Requirement: Iowa DNR Construction Permit 03-A-1149-S1

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible Emission Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (> 40 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Authority for Requirement: 567 IAC 22.108(14)		
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂	
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌	
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂	

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Emission Point ID Number: EP-41 and EP-41a Fug

Associated Equipment

Associated Emission Unit ID Numbers: EU-41a, EU-41b and EU 41a Fug

Emissions Control Equipment ID Number: CE-41

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-41 Emission Unit Description: Biomass Unloading & Conveying

Raw Material/Fuel: Oat Hulls Rated Capacity: 25.00 ton/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 03-A-1150-S1

(1) An exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: 567 IAC 23.4(7)

Iowa DNR Construction Permit 03-A-1150-S1

Pollutant: PM-10

Emission Limit(s): 0.15 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 03-A-1150-S1

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

The owner or operator shall inspect and maintain the dust collector according to manufacturer's recommendations.

The owner or operator shall keep records of control equipment inspections and maintenance.

Authority for Requirement: Iowa DNR Construction Permit 03-A-1150-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 72

Stack Opening, (inches, dia.): 8 inch Diameter

Exhaust Flow Rate (scfm): 1695 Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed Discharge

Authority for Requirement: Iowa DNR Construction Permit 03-A-1150-S1

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible Emission Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (>40%) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Authority for Requirement: 567 IAC 22.108(14)	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Emission Point ID Number: EP-42

Associated Equipment

Associated Emission Unit ID Numbers: EU-42 Emissions Control Equipment ID Number: CE-42

Emissions Control Equipment Description: Dust Collector

Emission Unit vented through this Emission Point: EU-40

Emission Unit Description: Biomass Silo Skirt

Raw Material/Fuel: Oat Hulls Rated Capacity: 25.00 ton/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 40%

Authority for Requirement: 567 IAC 23.3(2)"d"

Iowa DNR Construction Permit 03-A-1151

⁽¹⁾ An exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: 567 IAC 23.4(7)

Iowa DNR Construction Permit 03-A-1151

Pollutant: PM-10

Emission Limit(s): 0.10 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 03-A-1151

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

The owner or operator shall inspect and maintain the dust collector according to manufacturer's recommendations.

The owner or operator shall keep records of control equipment inspections and maintenance.

Authority for Requirement: Iowa DNR Construction Permit 03-A-1151

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 21 Stack Opening, (inches, dia.): 7.25 Exhaust Flow Rate (scfm): 690 Exhaust Temperature (°F): Ambient Discharge Style: Horizontal Discharge

Authority for Requirement: Iowa DNR Construction Permit 03-A-1151

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Visible Emission Monitoring:

Visible emissions shall be observed on a weekly basis to ensure that none occur when the emission unit on this emission point is at or near full capacity. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required. If an opacity (>40%) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from observation of the violation.

If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Maintain a written record of the observation and any action resulting from the observation for a minimum of five years.

Authority for Requirement: 567 IAC 22.108(14)	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🛛 No 🗌
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 22.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 22.105 (2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 22.108 (1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 22.108 (14)
- 5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. 567 IAC 22.108 (9)"b"

G2. Permit Expiration

- 1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. 567 IAC 22.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to EPA Region VII, Attention: Chief of Air Permits, 901 N. 5th St., Kansas City, KS 66101. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). 567 IAC 22.105

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the

reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

G6. Annual Fee

- 1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
- 4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

- 1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

G10. Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
 - a. The date, place and time of sampling or measurements
 - b. The date the analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
 - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
 - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
 - b. Maintain a log at the permitted facility of the scenario under which it is operating.
 - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

- 1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
 - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
 - b. Compliance test methods specified in 567 Chapter 25; or
 - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a. Any monitoring or testing methods provided in these rules; or
 - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the

incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

- a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:
 - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
 - ii. The estimated quantity of the excess emission.
 - iii. The time and expected duration of the excess emission.
 - iv. The cause of the excess emission.
 - v. The steps being taken to remedy the excess emission.
 - vi. The steps being taken to limit the excess emission in the interim period.
- b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
 - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
 - ii. The estimated quantity of the excess emission.
 - iii. The time and duration of the excess emission.
 - iv. The cause of the excess emission.
 - v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
 - vi. The steps that were taken to limit the excess emission.

vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)

- 3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The facility at the time was being properly operated;
 - c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
 - d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. 567 IAC 22.108(16)

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

- 1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
 - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
 - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);

- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
- d. The changes are not subject to any requirement under Title IV of the Act.
- e. The changes comply with all applicable requirements.
- f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
 - i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,
 - iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change.

567 IAC 22.110(1)

- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 22.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). 567 IAC 22.110(3)
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 22.110(4)
- 5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 22.108(11)

G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
 - a. An administrative permit amendment is a permit revision that is required to do any of the following:
 - i. Correct typographical errors
 - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source:
 - iii. Require more frequent monitoring or reporting by the permittee; or iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of

permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.

- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

2. Minor Permit Modification.

- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
 - i. Do not violate any applicable requirements
 - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
 - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
 - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
 - v. Are not modifications under any provision of Title I of the Act; and
 - vi. Are not required to be processed as significant modification.
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
 - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
 - ii. The permittee's suggested draft permit
 - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.
- 3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or

recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.105(1)"a"(4)

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 567 IAC 22.1(1)

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations, training fires and controlled burning of a demolished building. 567 IAC 23.1(3)"a", and 567 IAC 23.2

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
 - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

G24. Permit Reopenings

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 22.108(9)"c"
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
 - a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
 - b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.
 - c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and

the source receives approval for coverage under that general permit. 567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"

- 3. A permit shall be reopened and revised under any of the following circumstances:
 - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination;
 - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
 - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
 - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 22.114(1)
- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 22.114(2)

G25. Permit Shield

- 1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
 - a. Such applicable requirements are included and are specifically identified in the permit; or
 - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- 2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.
- 3. A permit shield shall not alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
 - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. 567 IAC 22.108 (18)

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 $IAC\ 22.108\ (9)"d"$

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. 567 IAC 22.111 (1)"d"

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits EPA Region 7 Air Permits and Compliance Branch 901 N. 5th Street Kansas City, KS 66101 (913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 4 Manchester, IA 52057 (563) 927-2640

Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

Field Office 5

401 SW 7th Street, Suite I Des Moines, IA 50309 (515) 725-0268

Polk County Public Works Dept.

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

Field Office 2

P.O. Box 1443 2300-15th St., SW Mason City, IA 50401 (641) 424-4073

Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

Field Office 6

1023 West Madison Street Washington, IA 52353-1623 (319) 653-2135

Linn County Public Health Dept.

Air Pollution Control Division 501 13th St., NW Cedar Rapids, IA 52405 (319) 892-6000